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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARAVAN, LTD.

Plaintiff,

-against-

Docket No.:
08 CV 4781 (GBD)

REPLY

DANA KAY, INC., J.C. PENNEY CO.,
INC., MACY'S and CATHERINE
STORES CORPORATION,

Plaintiff Caravan, Ltd., by its attorneys, Profeta & Eisenstein, as and for its reply to the counterclaims of defendants, states as follows upon information and belief:

1. Admits the allegations contained in paragraph 1 of the counterclaim.

2. Admits the allegations contained in paragraph 2 of the counterclaim.

3. Admits the allegations contained in paragraph 3 of the counterclaim.

4. Denies the allegations contained in paragraph 4 of the counterclaim.

5. Denies the allegations contained in paragraph 5 of the counterclaim.

6. Denies the allegations contained in paragraph 6 of the counterclaim.

7. Denies the allegations contained in paragraph 7 of the counterclaim.

8. Denies the allegations contained in paragraph 8 of the counterclaim.

9. Denies the allegations contained in paragraph 9 of the counterclaim.

10. With respect to the allegations repeated and realleged in paragraph 10 of the counterclaims, plaintiff makes the same admissions and denials as if herein set forth at length.

11. Admits the allegations contained in paragraph 11 of the counterclaim.

12. Denies the factual allegations contained in paragraph 12 of the counterclaim and respectfully refers questions of law to the Court.

13. Denies the factual allegations contained in paragraph 13 of the counterclaim and respectfully refers questions of law to the Court.

14. Denies the allegations contained in paragraph 14 of the counterclaim.

15. Paragraph 15 of the counterclaim need not be answered as it does not allege any material facts.

16. Denies the allegations contained in paragraph 16 of the counterclaim.

17. With respect to the allegations repeated and realleged in paragraph 17 of the counterclaim, plaintiff makes the same admissions and denials as if herein set forth at length.

18. Denies the allegations contained in paragraph 18 of the counterclaim.

19. Denies the allegations contained in paragraph 19 of the counterclaim.

20. Denies the allegations contained in paragraph 20 of the counterclaim.

21. With regard to the allegations repeated and realleged in paragraph 21 of the counterclaims, plaintiff makes the same admissions and denials as if herein set forth at length.

22. Denies the allegations contained in paragraph 22 of the counterclaim.

23. Denies the allegations contained in paragraph 23 of the counterclaim.


24. Denies the allegations contained in paragraph 24 of the counterclaim.

WHEREFORE, plaintiff prays for judgment dismissing the counterclaims with costs and disbursements.

Dated: New York, New York
August 4, 2008

Respectfully submitted,

PROFETA & EISENSTEIN
Attorneys for plaintiff

By: 

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TO:

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